

NOV 19 2024

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

Clerk, US District Court  
Western District NC

**UNITED STATES OF AMERICA**

**DOCKET NO. 3:24-cr-00238-FDW**

**v.**

**BILL OF INDICTMENT**

**Violations: 18 U.S.C. § 933(a)(1)  
18 U.S.C. § 922(a)(6)  
18 U.S.C. § 922(a)(1)(A)**

**WALTER ADONAI RIVERA CHINCHILLA**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

*(Trafficking in Firearms)*

From on or about September 23, 2024, through on or about October 2, 2024, in Mecklenburg County, within the Western District of North Carolina and elsewhere, the defendant,

**WALTER ADONAI RIVERA CHINCHILLA,**

did ship, transport, transfer, cause to be transported, or otherwise dispose of one or more of the following firearms:

1. a Glock, model 19 pistol,
2. a Glock, model 17 pistol, and
3. a Radical Firearms, model RF15, 5.56 caliber firearm,

to other persons, in or otherwise affecting interstate or foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of one or more of the firearms by the recipient would constitute a felony as defined in Title 18, United States Code, Section 932(a), in violation of Title 18, United States Code, Section 933(a)(1).

## **COUNT TWO**

*(False Statement During Purchase of a Firearm)*

On or about September 23, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

**WALTER ADONAI RIVERA CHINCHILLA,**

in connection with the acquisition of a firearm, a Glock, model 19, 9mm pistol, from Carolina Sporting Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Carolina Sporting Arms, which statement was intended and likely to deceive Carolina Sporting Arms, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact, as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

## **COUNT THREE**

*(False Statement During Purchase of a Firearm)*

On or about October 2, 2024, in Iredell County, within the Western District of North Carolina, the defendant,

**WALTER ADONAI RIVERA CHINCHILLA,**

in connection with the acquisition of firearms, a Radical Firearms, model RF15, 5.56 caliber firearm and a Glock, model 17, 9mm pistol from The Aisle Pawn Shop, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Aisle Pawn Shop, which statement was intended and likely to deceive The Aisle Pawn Shop, as to a fact material to the lawfulness of such sale of one or more of the said firearms to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact, as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT FOUR**

*(Dealing in Firearms without a License)*

From in or about March 20, 2024, and continuing through on or about October 31, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

**WALTER ADONAI RIVERA CHINCHILLA,**

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d) because they were involved in, used, or intended to be used in the violation alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a) three Glock model 34 firearms
- b) two Glock model 17L firearms
- c) a Glock model 17 firearm
- d) a Glock model 19 firearm
- e) a watchdog Multi-caliber firearm
- f) a Beretta model M9A3 firearm
- g) two Del-ton 5.56 caliber firearms
- h) a Radical Firearms model RF 15 firearm

A TRUE BILL

FOR PERSON

DENA J. KING  
UNITED STATES ATTORNEY

  
TIM SIELAFF  
ASSISTANT UNITED STATES ATTORNEY